



State of New Jersey

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Patricia Simmons-Pierre
Remedial Project Manager
USEPA Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

June 12, 2014

Re: L. E. Carpenter (LE)
Wharton, Morris County, New Jersey
SRP PI# 003017

Dear Ms. Simmons-Pierre:

The New Jersey Department of Environmental Protection (Department) has completed a review of the Response to Agency Comments on the Additional Wetland Delineation Sampling Results dated February 11, 2014, as well as Site Progress Reports 43, 44 and 45 dated January 10, 2014, February 10, 2014 and March 10, 2014, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

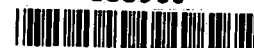
The Department's comments on these submittals are provided below.

Please be advised that this submittal which is in response the requirements for additional delineation does not address the Department's requirements for completing ground water delineation in the wetlands.

Subsequent to the excavation, source removal, and ground water remedial activities on the main portion of the site (Source Removal Area), an additional investigation revealed the presence of high concentrations of site related contaminants of concern (COCs) and product in the adjacent wetlands, just to the east of the remediated area. High levels of site related contaminants, suggestive of free phase product, were documented in several wells. MW-32S documented free phase product, as measured by interface probe.

Results of the required Additional Wetland Area Delineation field effort again indicated significant ground water contamination that may be discharging to the Rockaway River. Sample TW-35-5 reports 150,000 ppb DEHP (GWQS-3 ppb); 22,000 ppb ethylbenzene (GWQS-700 ppb); 130,000 ppb total xylene (GWQS-1000 ppb). Other well points report lower, but significant results. Since no other data points exist beyond these locations, the Department regards the requirement to complete

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delineation as incomplete.

The delineation effort was unsuccessful in sampling eight well points, and only four points were sampled. The report indicates refusal or lack of adequate water (at one location) precluded obtaining the required samples, therefore delineation remains incomplete. It is the Department's position that high levels of DEHP in the eastern wetlands may be suggestive of free phase product and therefore delineation is required (and if identified treatment/control) of the product. If DEHP is present as residual product, delineation of the dissolved ground water contamination is still required.

An ongoing discharge of free or dissolved product to an Environmentally Sensitive Natural Resource (ESNR) is unacceptable to the Department. An Ecological Evaluation and Risk Assessment pursuant to N.J.A.C. 7:26E-1.19 and N.J.A.C. 7:26E-3.11 must be conducted and appropriate remedial measures implemented. Characterization and delineation of contamination impacting the adjacent wetlands (i.e., ESNR) remains incomplete. Pore water sample SPW-R-3 collected from the banks of the Rockaway River showed DEHP at 50 ppb, more than two (2) orders of magnitude above the FW2 NJ SWQC Ecological Screening Criteria (ESC) of 0.003 ppb. Sediment collected from this same location showed DEHP at 400 ppm. The NJDEP ESC (Lowest Effects Level) for DEHP is 0.182 ppm. For comparison, the Severe Effects Level (SEL) is 0.750 ppm. Additional pore water and sediment sampling is necessary to delineate potential impacts to the river and associated wetlands, possibly followed by toxicity testing.

The technical basis for evaluating groundwater and pore water data against FW2 SWQC can be found in Section 6.2.2 of NJDEP's August 2011 *Ecological Evaluation Technical Guidance*. The entire guidance document may be found at http://www.nj.gov/dep/srp/guidance/srra/ecological_evaluation.pdf.

Response to Comment 1: The document states that the purpose of the temporary well point installation and sampling program was to serve as a baseline event to evaluate the efficacy of the phytoremediation pilot study and not intended as additional wetland delineation. The document further states that the data are sufficient to verify impacts to the wetlands area.

The Department does not concur with this response as there have been teleconference calls as well as a site field meeting which all centered on ground water contamination delineation in the wetlands. The focus of these discussions focused on delineation horizontally and vertically of the ground water contamination in the wetlands area to the Ground Water Quality Standards (GWQS). It is the Department's position that the wetlands ground water contamination delineation remains incomplete.

Response to Comment 2: The document states the purpose of temporary drive point 35-5, installed adjacent to MW-35, was to provide a comparison of sampling results between a properly installed and developed monitoring well and the drive point. The document further states turbidity is responsible for the elevated sampling results. Additionally, it is stated that subsequent sampling indicates reduced contamination.

The Department does not concur with the above response. It is the Department's understanding that the purpose of the drive point was to vertically delineate contamination, identify the "most contaminated zone" that contributes the contamination, and target this zone in subsequent sampling. The "installed and developed" well that is referenced averages contamination over the length of the screen. Regarding turbidity, labs test ground water samples for turbidity before analysis. If the test fails, the samples are filtered before analysis. If not, the samples are analyzed without further filtering. At this time the Department regards the samples from 35-5 as representative. Regarding

the reduced levels, it has been observed at many sites that sampling results can vary greatly between sampling rounds due to factors such as seasonality, changes in ground water levels, etc. This has been observed at the L.E. Carpenter site.

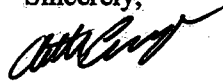
Response to Comment 3: The document states ground water contamination has been delineated horizontally and vertically in the wetland area.

As previously stated the Department does not concur with this statement as ground water sampling results indicate that ground water contamination remains undelineated horizontally and vertically and may suggest the presence of product in this area. Therefore, the Department considers the delineation incomplete and requires that delineation be completed at the previously approved locations. Any subsequent delineation must also profile sample each well to identify the contaminant contributing zone(s) so that subsequent ground water sampling targets this zone.

Please incorporate these comments into the letter that the USEPA will be sending to L.E. Carpenter.

If you have any questions regarding this matter I may be contacted at (609) 633-1416, or at Anthony.Cinque@dep.state.nj.us.

Sincerely,



Anthony Cinque, Case Manager
Bureau of Case Management

cc: Steve Byrnes, NJDEP/BEERA
George Blyskun, NJDEP/BGWPA